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11 UNITED STATES DISTRICT COURT  
12 FOR THE EASTERN DISTRICT OF WASHINGTON

13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 v.

16 NATHAN MICHAEL TRIANO,

17 Defendant.

2:22-CR-137-MKD

INDICTMENT

Vio: 18 U.S.C. § 1343

Wire Fraud  
(Counts 1-6)

18 U.S.C. § 287  
False, Fictitious, or Fraudulent  
Claims  
(Counts 7-8)

18 U.S.C. § 1028A  
Aggravated Identity Theft  
(Counts 9-12)

18 U.S.C. § 981  
28 U.S.C. § 2461  
Forfeiture Allegations

1 The Grand Jury charges:

2 GENERAL ALLEGATIONS

3 1. At all times relevant to this Indictment, Defendant, NATHAN  
4 MICHAEL TRIANO, was a resident of Davenport, Washington, in the Eastern  
5 District of Washington.

6 2. The Coronavirus Aid, Relief, and Economic Security Act (CARES Act)  
7 was a federal law enacted on March 27, 2020, designed to provide emergency  
8 financial assistance to the millions of Americans who were suffering the economic  
9 effects caused by the COVID-19 pandemic. One source of relief provided by the  
10 CARES Act was the authorization of forgivable loans to small businesses for job  
11 retention and other certain expenses, through a program referred to as the Paycheck  
12 Protection Program (PPP).  
13

14 3. In order to obtain a PPP loan, a qualifying business was required to  
15 submit a PPP loan application signed by an authorized representative of the business.  
16 The PPP loan application required the business (through its authorized  
17 representative) to acknowledge the program rules and make certain affirmative  
18 certifications in order to be eligible to obtain the PPP loan. In the PPP loan  
19 application, the applicant (through its authorized representative) was required to  
20 state, among other things: (a) its average monthly payroll expenses; and (b) its  
21 number of employees. If the applicant had no employees other than the owner, the  
22 applicant was required to provide the gross income amount from a 2019 or 2020 IRS  
23 Form 1040, Schedule C. These figures were used to calculate the amount of money  
24 the small business was eligible to receive under the PPP. Additionally, the applicant  
25 was required to certify that they were in operation as of February 15, 2020. The  
26 applicant was also required to certify that the information in the application was true  
27 and correct to the best of the applicant's knowledge.  
28

1           4.     A business's PPP loan application was received and processed, in the  
2 first instance, by a participating lender. If a PPP loan application was approved, the  
3 participating lender funded the PPP loan using its own monies. Data from the  
4 application, including information about the borrower, the total amount of the loan,  
5 the listed number of employees, and the gross income amount, was transmitted by  
6 the lender to the Small Business Administration (SBA), an agency of the United  
7 States, in the course of processing the loan.

8           5.     PPP applications are received in cloud-based platforms. The location of  
9 the server through which the PPP application is submitted is based on the date the  
10 application was processed by the SBA and the application number. During the time  
11 period relevant to this Indictment, all PPP applications were received through the  
12 Summit platform, a cloud-based platform utilizing the AWS GOV cloud servers  
13 located in Oregon. PPP lenders submitted disbursement details into the SBA E-Tran  
14 system in Sterling, Virginia, and E-Tran transmitted the PPP processing fee to the  
15 lender through the United States Treasury's Financial Management System (FMS)  
16 to the Treasury. The primary server for FMS is in Sterling, Virginia.

17  
18                               The Scheme

19           6.     The allegations in paragraphs 1 through 5 of this Indictment are  
20 incorporated as though realleged herein.

21           7.     Beginning no later than on or about February 10, 2021, and continuing  
22 through at least June 4, 2021, in the Eastern District of Washington and elsewhere,  
23 Defendant, NATHAN MICHAEL TRIANO, devised and intended to devise a  
24 scheme to defraud the SBA, and to obtain money and property by means of  
25 materially false and fraudulent pretenses, representations, and promises.

26           8.     Specifically, Defendant NATHAN MICHAEL TRIANO, applied for  
27 and received two PPP loans using false and fraudulent information about his alleged  
28 businesses, with the intent to defraud, steal, and convert the proceeds of the PPP

1 loans for Defendant NATHAN MICHAEL TRIANO's personal use and without any  
2 intent to use the proceeds thereof for any authorized purpose.

3 9. Defendant, NATHAN MICHAEL TRIANO, also knowingly and  
4 without lawful authority, possessed, used, and transferred one or more means of  
5 identification for three persons: A.G., T.R., and S.M., in order to fraudulently apply  
6 for and receive a total of four PPP loans in their names. Each loan purported to be a  
7 sole proprietorship or self-employed food contractor business and represented that  
8 the loan funding would be used to cover eligible payroll expenses. However, the  
9 proceeds from these loans were instead deposited in bank accounts controlled by  
10 Defendant, NATHAN MICHAEL TRIANO, and converted to his personal use.

11  
12 Manner and Means

13 It was part of this scheme that:

14 Paycheck Protection Program Loan No. 81722186-07

15 10. On or about March 25, 2021, Defendant, NATHAN MICHAEL  
16 TRIANO, submitted an application for PPP Loan No. 81722186-07 to the SBA.  
17 Defendant indicated the requested PPP funding was for a sole proprietorship food  
18 service contractor business owned and operated by Defendant NATHAN  
19 MICHAEL TRIANO. Defendant, NATHAN MICHAEL TRIANO, listed the  
20 business address as 6709 Kieffer Rd, Unit 6, Davenport WA 99122. Defendant  
21 listed his social security number as the Business Tax Identification Number (TIN).  
22 This application was submitted from Internet Protocol (IP) address 161.199.104.194.

23 11. Defendant, NATHAN MICHAEL TRIANO, falsely and fraudulently  
24 stated in his application submissions for PPP Loan No. 81722186-07 that this  
25 business had been established on June 6, 2006, and that it had \$2,118,864 in gross  
26 income in 2019. In support of the false and fraudulent application, Defendant  
27 included a falsified IRS Form 1040, Schedule C, as well as a falsified bank account  
28 statement purporting to show that Defendant's Middlesex Federal Savings, F.A.,

1 Bank Account ending in 1317 existed in February of 2020. However, Defendant's  
2 Middlesex Federal Savings, F.A., Bank Account ending in 1317 was created in April  
3 of 2020.

4 12. These representations, made by Defendant, were materially false and  
5 fraudulent, and Defendant knew they were false and fraudulent at the time they were  
6 made. Defendant, NATHAN MICHAEL TRIANO, did not have an active business  
7 with \$2,118,864 in gross income in 2019 and was not eligible for the requested PPP  
8 funding.

9 13. Based on the false information he provided, Defendant, NATHAN  
10 MICHAEL TRIANO, requested PPP funding in the amount of \$20,833, the  
11 maximum amount of PPP funding available for a sole proprietorship. As a result of  
12 the fraudulent scheme described above, and the materially false and fraudulent  
13 information supplied by Defendant, NATHAN MICHAEL TRIANO, the SBA  
14 approved PPP Loan No. 81722186-07.

15 14. PPP Loan No. 81722186-07 was handled by Amur Equipment Finance,  
16 a lending institution located in Grand Island, Nebraska on a delegated basis from the  
17 SBA. Amur Equipment Finance submitted disbursement details for this loan into  
18 the SBA E-Tran system located in Sterling, Virginia.

19 15. On March 30, 2021, relying on the false and fraudulent application and  
20 the false and fraudulent information submitted by Defendant, NATHAN MICHAEL  
21 TRIANO, in support thereof, Amur Equipment Finance disbursed \$20,833 into  
22 Defendant NATHAN MICHAEL TRIANO's Middlesex Federal Savings, F.A.,  
23 Bank Account ending in 1317, located in Davenport, Washington.

24 16. Defendant NATHAN MICHAEL TRIANO's Middlesex Federal  
25 Savings, F.A., Bank Account ending in 1317 was created on April 24, 2020, from  
26 IP address 161.199.104.194, in the name of, "Nathan Triano DBA Speed Cleaning."  
27  
28

1 The customer address for this account is 6709 Kieffer Rd, Unit G, Davenport, WA  
2 99122.

3 17. On or about September 16, 2021, Defendant, NATHAN MICHAEL  
4 TRIANO, requested loan forgiveness of the entire fraudulently-received PPP loan  
5 amount. The loan was forgiven by the SBA on September 27, 2021.

6 Paycheck Protection Program Loan No. 18324288-01

7 18. On or about April 12, 2021, Defendant, NATHAN MICHAEL  
8 TRIANO, submitted an application for PPP Loan No. 18324288-01 to the SBA in  
9 the name of his purported company, "Nathan Triano DBA Speed Cleaning" (Speed  
10 Cleaning). Defendant, NATHAN MICHAEL TRIANO, listed Speed Cleaning's  
11 address as 6709 Kieffer Rd Unit 6, Davenport WA 99122. Defendant listed his social  
12 security number as the TIN. This application was submitted from IP address  
13 161.199.104.194.  
14

15 19. Defendant, NATHAN MICHAEL TRIANO, falsely and fraudulently  
16 stated in his application for PPP Loan No. 18324288-01 that Speed Cleaning had  
17 been established June 6, 2006, and that it had \$2,118,864 in gross income in 2019.  
18 In support of this application, Defendant included a falsified IRS Form 1040,  
19 Schedule C, as well as a falsified bank account statement purporting to show that  
20 Defendant's Middlesex Federal Savings, F.A., Bank Account ending in 1317 existed  
21 in February of 2020.

22 20. These representations were materially false and fraudulent. Speed  
23 Cleaning was not an active business as of February 15, 2020, meaning that Speed  
24 Cleaning was not eligible for any PPP funding. Moreover, Speed Cleaning did not  
25 have \$2,118,864 in gross income in 2019.  
26

27 21. Based on the false information he provided, Defendant, NATHAN  
28 MICHAEL TRIANO, requested PPP funding for Speed Cleaning in the amount of  
\$29,166. As a result of the fraudulent scheme described above and the materially

1 false and fraudulent information supplied by Defendant NATHAN MICHAEL  
2 TRIANO, the SBA approved PPP Loan No. 18324288-01.

3 22. PPP Loan No. 18324288-01 was handled by Amur Equipment Finance,  
4 a lending institution located in Grand Island, Nebraska on a delegated basis from the  
5 SBA. Amur Equipment Finance submitted disbursement details for this loan into  
6 the SBA E-Tran system located in Sterling, Virginia.

7 23. On April 21, 2021, relying on the false and fraudulent application and  
8 the false and fraudulent information submitted by Defendant, NATHAN MICHAEL  
9 TRIANO, in support thereof, Amur Equipment Finance Corporation disbursed  
10 \$29,166 in PPP funding into Defendant NATHAN MICHAEL TRIANO's  
11 Middlesex Federal Savings, F.A., Bank Account ending in 1317, located in  
12 Davenport, Washington.

13 24. On or about September 16, 2021, Defendant, NATHAN MICHAEL  
14 TRIANO, requested loan forgiveness of the entire fraudulently received PPP loan  
15 amount. The loan was forgiven by the SBA on September 28, 2021.

16 Paycheck Protection Program Loan No. 95858286-05

17 25. On or about March 27, 2021, Defendant NATHAN MICHAEL  
18 TRIANO, knowingly and without lawful authority, possessed, used, and transferred  
19 means of identification for A.G. to fraudulently apply for PPP Loan No. 95858286-  
20 05 in the amount of \$20,833. The loan application falsely purported to be on behalf  
21 of A.G. and her food service contractor business located in Spokane, WA, where she  
22 was purportedly self-employed. Defendant, NATHAN MICHAEL TRIANO,  
23 fraudulently and without lawful authority used the name, social security number,  
24 driver's license, and signature of A.G. to obtain this funding. In support of this  
25 application, Defendant also fraudulently included an IRS Form 1040, Schedule C,  
26 as well as a falsified bank account statement purporting to show that the account  
27 identified for disbursement existed in February of 2020.  
28



1        26. As a result of the fraudulent scheme described above and the materially  
2 false and fraudulent information supplied by Defendant NATHAN MICHAEL  
3 TRIANO, the SBA approved PPP Loan No. 95858286-05. PPP Loan No. 95858286-  
4 05 was handled by Amur Equipment Finance, a lending institution located in Grand  
5 Island, Nebraska on a delegated basis from the SBA. Amur Equipment Finance  
6 submitted disbursement details for this loan into the SBA E-Tran system located in  
7 Sterling, Virginia.

8        27. On April 11, 2021, relying on the false and fraudulent application and  
9 the false and fraudulent information submitted in support thereof, Amur Equipment  
10 Finance disbursed \$20,833 of PPP loan proceeds into a MetaBank Checking  
11 Account ending in 8805. Prior to the loan disbursement, the account had a \$0.00  
12 balance.

13        28. MetaBank Checking Account ending in 8805 was opened electronically  
14 in the name of A.G. on September 13, 2020. However, the address listed for this  
15 account is 6709 Kieffer Rd, Unit G, Davenport, WA, the same customer address as  
16 NATHAN MICHAEL TRIANO's Middlesex Federal Savings, F.A., Bank Account.

17        29. The IP address used for A.G.'s loan application was 161.199.104.194,  
18 the same IP address used to submit Defendant NATHAN MICHAEL TRIANO'S  
19 loan applications submitted in his own name.

20                    Payment Protection Program Loan No. 48545984-08

21        30. On or about February 10, 2021, Defendant, NATHAN MICHAEL  
22 TRIANO, knowingly and without lawful authority, possessed, used, and transferred  
23 means of identification for T.R. to fraudulently apply for PPP Loan No. 48545984-  
24 08 in the amount of \$20,500. The loan application falsely purported to be on behalf  
25 of T.R., and his food service contractor business, a purported sole proprietorship  
26 located at 67009 Kieffer Rd. Ste. 6, Davenport, WA 99122. Defendant, NATHAN  
27 MICHAEL TRIANO, fraudulently and without legal authority used the name, social  
28



1 security number, driver's license, and signature of T.R. to obtain the funding. In  
2 support of this application, Defendant also fraudulently included an IRS Form 1040,  
3 Schedule C and a falsified bank account statement purporting to show that the  
4 account identified for disbursement existed in February of 2020 and belongs to T.R.  
5 However, the account identified for disbursement was Defendant's Middlesex  
6 Federal Savings, F.A., Bank Account ending in 1317, and the withdrawals identified  
7 on the account statement include references to Speed Cleaning.

8  
9 31. As a result of the fraudulent scheme described above and the materially  
10 false and fraudulent information supplied by Defendant NATHAN MICHAEL  
11 TRIANO, the SBA approved PPP Loan No. 48545984-08. PPP Loan No. 48545984-  
12 08 was handled by Itria Ventures LLC, a lending intuition located in New York,  
13 New York. Itria Ventures LLC submitted disbursement details for this loan into the  
14 SBA E-Tran system located in Sterling, Virginia.

15 32. On March 4, 2021, Itria Ventures LLC disbursed \$20,500 in PPP loan  
16 proceeds to Middlesex Federal Savings Account ending in 1317 belonging to  
17 Defendant NATHAN MICHAEL TRIANO.

18 Payment Protection Program Loan No. 27877690-04

19 33. On or about May 25, 2021, Defendant, NATHAN MICHAEL  
20 TRIANO, knowingly and without lawful authority, possessed, used, and transferred  
21 means of identification for T.R. to fraudulently apply for PPP Loan No. 27877690-  
22 04 in the amount of \$28,700. The loan application falsely purported to be on behalf  
23 of T.R. and his food service contractor business, a purported sole proprietorship  
24 located at 6709 Keiffer Road, Davenport, WA 99122. Defendant, NATHAN  
25 MICHAEL TRIANO, fraudulently and without lawful authority used the name,  
26 social security number, driver's license, and signature of T.R. to obtain the funding.  
27 In support of this application, Defendant also fraudulently included an IRS Form  
28 1040, Schedule C and a falsified bank account statement purporting to show that the

1 account identified for disbursement existed in February of 2020 and belonged to  
2 T.R. However, the account identified for disbursement was Defendant's Middlesex  
3 Federal Savings, F.A., Bank Account ending in 1317, and the withdrawals identified  
4 on the account statement include references to Speed Cleaning.

5 34. As a result of the fraudulent scheme described above and the materially  
6 false and fraudulent information supplied by Defendant NATHAN MICHAEL  
7 TRIANO, the SBA approved PPP Loan No. 27877690-04. PPP Loan No. 27877690-  
8 04 was handled by Amur Equipment Finance, a lending institution located in Grand  
9 Island, Nebraska on a delegated basis from the SBA. Amur Equipment Finance  
10 submitted disbursement details for this loan into the SBA E-Tran system located in  
11 Sterling, Virginia.

12  
13 35. On June 4, 2021, relying on the false and fraudulent application and the  
14 false and fraudulent information submitted by Defendant, NATHAN MICHAEL  
15 TRIANO, in support thereof, Amur Equipment Finance disbursed \$28,700 in PPP  
16 Loan Proceeds to Middlesex Federal Savings account ending in 1317 belonging to  
17 Defendant NATHAN MICHAEL TRIANO.

18 Paycheck Protection Program Loan No. 29385988-09

19 36. On or about April 8, 2021, Defendant NATHAN MICHAEL TRIANO,  
20 knowingly and without lawful authority, possessed, used, and transferred means of  
21 identification for S.M. to fraudulently apply for PPP Loan No. 29385988-09 in the  
22 amount of \$20,833. The loan application falsely purported to be on behalf of S.M.  
23 and her food service contractor business, where she was purportedly self-employed.  
24 Defendant, NATHAN MICHAEL TRIANO, fraudulently and without lawful  
25 authority used the name, social security number, driver's license, and signature of  
26 S.M. to obtain this funding. Defendant also fraudulently included an IRS Form  
27 1040, Schedule C, as well as a falsified bank account statement purporting to show  
28 that an account in the name of S.M. that existed in February of 2020.

37. As a result of the fraudulent scheme described above and the materially false and fraudulent information supplied by Defendant NATHAN MICHAEL TRIANO, the SBA approved PPP Loan No. 29385988-09. PPP Loan No. 29385988-09 was handled by Benworth Capital, a lending institution located in Miami, Florida on a delegated basis from the SBA. Benworth Capital submitted disbursement details for this loan into the SBA E-Tran system located in Sterling, Virginia.

38. On May 28, 2021, relying on the false and fraudulent application and false and fraudulent application submitted by Defendant, NATHAN MICHAEL TRIANO, in support thereof, Benworth Capital disbursed \$20,888 in PPP Loan Proceeds to Middlesex Federal Savings account ending in 1317 belonging to Defendant, NATHAN MICHAEL TRIANO.

Counts 1-6

39. The allegations in paragraphs 1 through 38 of this Indictment are incorporated as though realleged herein.

40. On or about each of the dates set forth below, in the Eastern District of Washington and elsewhere, Defendant, NATHAN MICHAEL TRIANO, for the purpose of executing the scheme described above, caused to be transmitted by means of wire communication in interstate commerce the signals and sounds described below for each count, each transmission constituting a separate count:

Count	Date	Description
1	March 30, 2021	EFT payment from Amur Equipment Finance in Grand Island, Nebraska, to Middlesex Federal Savings Account ending in 1317 in Davenport, WA, in the amount of \$20,833 for PPP Loan No. 81722186-07.
2	April 21, 2021	EFT payment from Amur Equipment Finance in Grand Island, Nebraska, to Middlesex Federal Savings Account ending in 1317 in Davenport, WA, in the amount of \$29,166 for PPP Loan No. 18324288-01.

3	March 27, 2021	Application for PPP Loan No. 95858286-05, electronically submitted from the Eastern District of Washington to the SBA in Oregon.
4	February 10, 2021	Application for PPP Loan No. 48545984-08, electronically submitted from the Eastern District of Washington to the SBA in Oregon.
5	May 25, 2021	Application for PPP Loan No. 27877690-04, electronically submitted from the Eastern District of Washington to the SBA in Oregon.
6	April 8, 2021	Application for PPP Loan No. 29385988-09, electronically submitted from the Eastern District of Washington to the SBA in Oregon.

All in violation of 18 U.S.C. § 1343.

Counts 7-8

41. The allegations in paragraphs 1 through 40 of this Indictment are incorporated as though realleged herein.

42. On or about each of the dates set forth below, in the Eastern District of Washington and elsewhere, Defendant, NATHAN MICHAEL TRIANO, made and presented to the Small Business Administration claims, an agency of the United States, knowing said claims were false and fraudulent, and knowing the information submitted was materially false and fraudulent, described below for each count, each transmission constituting a separate count:

Count	Date	Description
7	March 25, 2021	PPP application for PPP Loan No. 81722186-07 in the name of Nathan Triano for a PPP loan in the amount of \$20,833.
8	April 12, 2021	PPP application for PPP Loan No. 18324288-01 in the name of Nathan Triano DBA Speed Cleaning for an PPP loan in the amount of \$29,166.

All in violation of 18 U.S.C. § 287.

Count 9-12

## 18 U.S.C. § 1028A – Aggravated Identity Theft

43. Further, the allegations in paragraphs 1 through 42 in the Indictment are re-alleged and incorporated into this count as if fully set forth herein.

44. On or about each of the dates set forth below, in the Eastern District of Washington and elsewhere, Defendant, NATHAN MICHAEL TRIANO, did knowingly and without lawful authority, possessed, used, and transferred ~~transfer~~ *FKY* ~~and use~~, without lawful authority, one or more means of identification of another person, during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c)(5), knowing that the means of identification belonged to another actual person, in violation of 18 U.S.C. § 1028A(a)(1), described below for each count, each transfer constituting a separate count:

9	March 27, 2021	Possession, use, or transfer of means of identification for A.G., during and in relation to the felony violation of 18 U.S.C. § 1343, as charged above in Count 3.
10	February 10, 2021	Possession, use, or transfer of means of identification for T.R. during and in relation to the felony violation of 18 U.S.C. § 1343, as charged above in Count 4.
11	May 25, 2021	Possession, use, or transfer of means of identification for T.R. during and in relation to the felony violation of 18 U.S.C. § 1343, as charged above in Count 5.
12	April 8, 2021	Possession, use, or transfer of means of identification for S.M. during and in relation to the felony violation of 18 U.S.C. § 1343, as charged above in Count 6.

All in violation of 18 U.S.C. § 1028A(a)(1).



NOTICE OF FORFEITURE ALLEGATIONS

The allegations contained in this Indictment are hereby realleged and incorporated herein by this reference for the purpose of alleging forfeitures.

Wire Fraud

Pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), upon conviction of an offense in violation of 18 U.S.C. § 1343, as set forth in this Indictment, Defendant NATHAN MICHAEL TRIANO, shall forfeit to the United States any property, real or personal, which constitutes or is derived from proceeds traceable to the offense. The property to be forfeited includes, but is not limited to, the following:

MONEY JUDGMENT

A sum of money equal to \$49,999.00 in United States currency, representing the amount of proceeds obtained by Defendant from the wire fraud violations.

If any of the property described above, as the result of any act or omission of the Defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty,

the United States shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c).

1        Aggravated Identity Theft

2        Pursuant to 18 U.S.C. § 982(a)(2)(B) and/or 18 U.S.C. § 1028(b), upon  
3 conviction of the offense(s) in violation of 18 U.S.C. § 1028A(a)(1), as set forth in  
4 this Indictment, Defendant, NATHAN MICHAEL TRIANO, shall forfeit to the  
5 United States of America, any property constituting, or derived from, proceeds  
6 obtained, directly or indirectly, as a result of such violation(s); and/or any personal  
7 property used or intended to be used to commit the offense(s). The property to be  
8 forfeited includes, but is not limited to, the following:  
9

10        MONEY JUDGMENT

11        A sum of money equal to \$90,866.00 in United States currency  
12 representing the amount of proceeds obtained as a result of the  
13 aggravated identity theft offense(s).

14        If any of the property described above, as a result of any act or omission of  
15 the Defendant:

- 16        a.       cannot be located upon the exercise of due diligence;  
17        b.       has been transferred or sold to, or deposited with, a third party;  
18        c.       has been placed beyond the jurisdiction of the court;  
19        d.       has been substantially diminished in value; or  
20        e.       has been commingled with other property which cannot be divided  
21               without difficulty,

22        ///

23        ///

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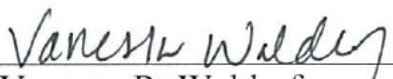
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1 the United States of America shall be entitled to forfeiture of substitute property  
2 pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. §§ 982(b)(1) and  
3 1028(g) and 28 U.S.C. § 2461(c). All pursuant to 18 U.S.C. §§ 982(b)(1) and  
4 1028(g) and 28 U.S.C. § 2461(c).

5  
6 DATED this 5<sup>th</sup> day of October 2022.

7  
8 A TRUE BILL  
9

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11  
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14 Vanessa R. Waldref  
15 United States Attorney

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17   
18 Frieda K. Zimmerman  
19 Special Assistant United States Attorney

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21 Dan Fruchter  
22 Assistant United States Attorney  
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